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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 GLENFORD BUDD,

11 Petitioner,

12 v.

Case No. 2:16-cv-00613-RFB-PAL

13 RENEE BAKER, et al.

14 Respondents.

15 _____/
16 UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE AMENDED PETITION
17 (FOURTH REQUEST)

18 COMES NOW GLENFORD BUDD, by and through counsel, MARY LOU WILSON, and
19 Moves this Honorable Court for an Order extending the time within which to file a counseled
20 Amended Petition for Writ of Habeas Corpus (Post Conviction).

21 On September 5, 2017, this Court filed an Order Appointing Counsel and providing 60 days
22 within which to file an Amended Petition. ECF No. 14.

23 Budd moved for an extension of time of 90 days on October 30, 2017 (ECF No. 16) which
24 this Court approved that same day. ECF No. 16.
25

1 On January 29, 2018, Budd moved this Court for a second extension of time, which was
2 approved. ECF No. 18.

3 Petitioner moved for a third extension of time of 30 days on April 17, 2018 (ECF No. 19)
4 which was approved by this Court. ECF No. 20.

5 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure
6 granting this Court the ability to extend the time in which to file an amended petition as well as
7 28 U.S.C. §2242 (Application for a writ of habeas corpus shall be in writing signed and verified
8 by the person for whose relief it is intended or by someone acting in his behalf.).
9

10 Since the Third Motion for Extension of Time was filed, Counsel has completed the Amended
11 Petition and mailed a copy to Petitioner along with a verification for him to sign and return. As
12 of the date of this filing, Counsel for Petitioner has not received either his signed verification nor
13 any indication that Petitioner takes issue with anything in the Amended Petition.

14 Therefore, Counsel believes that an extension of 30 days is reasonable and necessary to
15 receive the signed verification of the Amended Petition from Petitioner and file the Amended
16 Petition with exhibits.

17 It should be noted that as soon as Counsel for Petitioner receives his verification, she will file
18 the Amended Petition, exhibits, and verification.

19 On May 22, 2018 Counsel for Respondents advised that Respondents do not oppose this
20 motion for extension of time with the express understanding that Respondents' non-opposition is
21 not to be construed as a waiver to any procedural defenses including timeliness or procedural
22 bars, that may apply to this or any future amended petition.
23

24 This is the fourth request for an extension of time within which to file the Amended Petition.
25

1 Therefore, Petitioner Budd requests an extension of time of 30 days, or until June 23, 2018,
2 within which to file the Amended Petition.


3 This request is made in good faith and not for the purpose of delay.

4 Dated this 23rd day of May, 2018.

5
6 By: /s/ MARY LOU WILSON
7 MARY LOU WILSON
Attorney for Petitioner Budd

8
9 APPROVED:

10 DATED this 29th day of May, 2018.

11
12 
13 _____
14 RICHARD F. BOULWARE, II
United States District Judge

1 GLENFORD BUDD,

2 Petitioner,

3 v.

Case No. 2:16-cv-00613-RFB-PAL

4 RENEE BAKER, et al.

5 Respondents.

CERTIFICATE OF SERVICE

6 _____/
7 The undersigned hereby certifies that she is of legal age and discretion as to be competent
8 to serve papers.

9 That on the 23rd day of May, 2018, she served a copy of Budd's Motion for Extension of
10 Time by electronic mail.
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12
13 /s/: MARY LOU WILSON
14 MARY LOU WILSON
Attorney for Petitioner Budd
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